

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE

In re

Mark Steven Reggianinni,  
Debtor

Bk. No. 21-10319-BAH  
Chapter 7

**EX PARTE MOTION TO DELAY CASE CLOSURE**

NOW COMES Debtor Mark Steven Reggianinni, by his attorney, Randall B. Clark, to move the Court to delay closure of his case until October 6, at the earliest, so as to give the Debtor time to amend his schedules to include unlisted debts.

1. As Debtor's case progressed, he became aware of the existence of a judgment in the State of New York against one of his now-defunct corporations. It is unknown to Debtor whether he has personal liability for it. In fact, Debtor has not yet located the order.

2. On September 1, 2021 the Court granted Debtor his discharge. Debtor anticipates imminent closure of his case.

3. Debtor desires, if necessary, to amend his schedules to include this debt of uncertain nature. To do so, he needs to conduct additional research and then, if necessary, amend his schedules. Debtor anticipates that this task should take him no more than 30 days.

4. Debtor, desires, therefore, that the Court procrastinate his cases's closure.

WHEREFORE, Debtor prays that this Court enter an order delaying case closure not sooner than October 7, 2021.

Date: September 7, 2021

/s/ Randall B. Clark

Randall B. Clark

Bar No. BNH07615

80 West Hollis Road

Hollis, NH 03049

rbc@randallbclark.com

603-801-3039